

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	Chapter 11
RIGHT OF WAY MAINTENANCE	§	
EQUIPMENT COMPANY	§	
	§	Case No. 09-35037
DEBTOR	§	
	§	

**SUPPLEMENTAL OBJECTION TO CONFIRMATION OF THIRD AMENDED PLAN
OF REORGANIZATION PROPOSED BY RIGHT OF WAY MAINTENANCE
EQUIPMENT COMPANY**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Chris Bandas, The Bandas Law Firm, Jeffrey D. Meyer, and Moulton & Meyer, LLP (collectively the “Bandas Parties”), creditors and parties in interests hereby file this supplemental objection to confirmation of the Third Amended Plan of Reorganization Proposed by Right of Way Maintenance Equipment Company (the “Plan”), as modified by the First Modification to Third Amended Plan (“First Modification”) filed on June 17, 2010. This Supplemental Objection addresses the First Modification as well as developments in the State Court Litigation which materially impact the return to creditors. The Bandas Parties maintain their original timely initial Objection to Confirmation of Plan (copy attached as Exhibit A. The grounds for this supplemental objection are as follows:

Status of State Court Litigation

1. In its Chapter 11 Plan, the Debtor submits that \$591,144.93 is on deposit in the registry of the state court which might be available for distribution to Class 4 and Class 5 creditors if it prevails on its claims against the Bandas Parties. However, the state court recently entered a summary judgment which will entitle the Bandas Parties to withdraw \$218,543.64

from the Court registry. Therefore, this source of funding will not be available for the Debtor's other creditors.

Plan Modification

2. The First Modification represents an attempt to remedy the fact that the Plan discriminates in favor of the Class 3 unsecured creditor, Risley Equipment, Inc. ("Risley"). Although Risley is an unsecured creditor, the Plan placed it in a separate class and proposed to pay it 100% of proceeds of the sale of certain equipment as if it were a secured creditor. The Bandas Parties objected to this discriminatory treatment. Apparently in recognition of the fact that this treatment was discriminatory, the Debtor filed the First Modification which provides that if the Court estimates the Bandas Parties claim and/or grants its objection, the Debtor may, in its sole discretion, move Risley into Class 4. This modification does not solve the problem for several reasons. First, until the Debtor decides what it intends to do, the Plan remains discriminatory. Second, the modification does not resolve any of the other objections contained in the Bandas Parties original confirmation objection. These objections are described in the attached Exhibit A.

WHEREFORE, the Bandas Parties pray that the Court deny confirmation and grant such other and further relief as is just and proper.

DATED: July 2, 2010

Respectfully submitted,

HOOVER SLOVACEK LLP

By: /s/ Edward L. Rothberg
EDWARD L. ROTHBERG
State Bar No. 17313990
MELISSA A. HASELDEN
State Bar No. 00794778
ANNIE E. CATMULL
State Bar No. 00794932
5847 San Felipe, Suite 2200
Houston, Texas 77057
Telephone: (713) 977-8686
Facsimile: (713) 977-5395

ATTORNEYS FOR CHRIS BANDAS, THE BANDAS LAW
FIRM, JEFFREY D. MEYER, AND MOULTON & MEYER, LLP

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2010, a true and correct copy of the foregoing document was forwarded to all parties on the attached Service List via ECF and/or First Class Mail.

/s/ Edward L. Rothberg
EDWARD L. ROTHBERG

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	Chapter 11
RIGHT OF WAY MAINTENANCE	§	
EQUIPMENT COMPANY	§	
	§	Case No. 09-35037
DEBTOR	§	
	§	

**OBJECTION TO CONFIRMATION OF THIRD AMENDED PLAN OF
REORGANIZATION PROPOSED BY RIGHT OF WAY MAINTENANCE
EQUIPMENT COMPANY**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Chris Bandas, The Bandas Law Firm, Jeffrey D. Meyer, and Moulton & Meyer, LLP (collectively the “Bandas Parties”), creditors and parties in interests hereby object to confirmation of the Third Amended Plan of Reorganization Proposed by Right of Way Maintenance Equipment Company (the “Plan”). The grounds for this objection are as follows:

Introduction

1. The Bandas Parties are attorneys who represented the Debtor in a lawsuit against Gyro-Trac.¹ The Bandas Parties obtained a judgment against Gyro-Trac, which has been affirmed by the Fifth Circuit Court of Appeals. Moreover, the Bandas Parties actually collected \$3.6 million, representing the entire principal balance due. The Bandas Parties undertook this representation on a contingency fee basis and advanced hundreds of thousands of dollars in costs. Despite this phenomenal success, the Debtor sued the Bandas Parties for malpractice and has made this alleged “malpractice” claim the centerpiece of its Plan.

2. The Bandas Parties are creditors in this case with respect to the balance of fees

¹ The Gyro-Trac II Lawsuit.

due them in the Gyro-Trac II litigation. The Gyro-Trac II judgment proceeds are located in the registry of the 113th Judicial District Court of Harris County, Texas (the “State Court”). This is also the Court where the Debtor’s claims against the Bandas Parties are pending. The automatic stay has been lifted to permit the State Court to adjudicate all issues between the parties including the entitlement to the funds in the court registry for payment of fees and expenses or other damages. The Plan preserves the right of the Bandas Parties to be paid from the registry proceeds.

3. However, the Bandas Parties also filed an unsecured claim in this case for attorneys’ fees in the amount of \$93,045.97 plus an undetermined amount for malicious prosecution.

4. On April 23, 2010, the Bandas Parties filed a Motion to Estimate their claim in the in the total amount of \$334,902.16.²

5. The Bandas Parties have voted to reject the Plan.

Grounds for Objection

6. The Bandas Parties’ hold a general unsecured claim contained in Class 4. Until the Court estimates the Bandas Parties’ claim it is impossible to tell whether Class 4 accepted the plan or whether it must be crammed down. If Class 4 has not accepted, the Plan cannot be confirmed. The reasons for this are as follows:

- a. Class 7 provides for the Allowed Interests of the Debtor’s shareholders. It states that the shareholders shall retain their interests after confirmation.
- b. If Class 4 has not accepted the Plan, the treatment of Class 7 violates 11 U.S.C.

² This claim does not include amounts referred to above that are on deposit in the registry of the State Court. The stay has been lifted and ownership of those funds will be determined by the State Court. The claim the Bandas Parties seek to estimate is a general unsecured claim over and above the amounts sought which are held in the registry of the State Court.

§1129(b)(2)(B)(ii) which prohibits interest holders from receiving any consideration unless creditors are being paid in full with interest. The Plan does not provide for payment of Class 4 in full with interest. Therefore, if Class 4 has not accepted the Plan, it cannot be confirmed.

7. Contrary to §1129(a)(1), the Plan does not comply with the applicable provisions of Title 11. The reasons for this are as follows:

- a. The Plan places the unsecured claim of Risley Equipment, Inc., in a separate class (i.e. Class 3) and proposes to pay it in full with the proceeds of sale of a tractor. Even though Risley is an unsecured creditor, it is essentially being treated as a secured creditor entitled to the sale proceeds of a particular asset. This provision violates 11 U.S.C. §1122 regarding classification of claims. Neither the disclosure statement nor the Plan sets out any justifiable reason as to why Risley should be treated differently from the other unsecured creditors.
- b. The treatment also violates §1123(a)(4) which requires the same treatment for claim within a class unless the holder of such claim consents to a less favorable treatment. In other words, Risley should have been treated in Class 4, and it is highly unlikely that those creditors in Class 4 who voted in favor of the Plan did so with the knowledge that they were being treated less favorably than Risley.

8. Based on the disparate treatment of Classes 3 and 4 without any reasonable justification, the Plan unfairly discriminates between classes in violation of 11 U.S.C. §1129(b)(1).

9. The Plan and the Disclosure Statement fail to disclose the compensation to be paid to insiders as required by 11 U.S.C. §1129(a)(5)(B).

10. The Plan is not feasible as required by 11 U.S.C. §1129(a)(11). The reasons for this are as follows:

- a. Class 1 is the administrative claim class. It provides that administrative claims will be paid in full in cash. According to the latest Monthly Operating Report,³ there are unpaid administrative claims in the amount of \$26,985 for professional fees. However, this amount has not changed since September 2009. Surely, the amount due has increased, and there will be additional U.S. Trustee fees. The February MOR shows cash in the amount of \$5,319.52. Therefore, the Debtor does not have sufficient cash on hand to pay administrative expenses. As such,

³ The latest report is for February. The Debtor is delinquent with respect to the filing of its March report.

the Plan which requires such claims to be paid in full in cash is not feasible.

- b. Class 2 is the Allowed Secured Claim of Alltex Interior Supply in the amount of approximately \$211,538. The Plan states that this debt is not in default and payments are current. The Plan does not set forth the monthly payment on this claim. According to MOR-7, the Debtor had been paying \$2,609 for monthly secured rental/leases, but that amount has dropped recently to \$750. Presumably, this was the payment to Alltex. Although Alltex may not have called a default, it does not appear that the Debtor has been able to remain current. There is nothing contained in the MOR which indicates that this situation will change in the future.
- c. Class 4 consists of the general unsecured claims. The Plan provides for payments to this class in the amount of \$7,500 per quarter for a period of 8 years, and indicates that this will generate a return of 60 cents on the dollar to unsecured creditors. The balance of the potential return under the Plan is supposed to come from the Debtor's alleged malpractice claims against the Bandas Parties. The Bandas Parties dispute that the creditors will generate any return from that litigation. Moreover, the financial information provided by the Debtor simply does not substantiate that it will be able to make the \$7500 quarterly payments. Hence, the Plan is not feasible.

11. Section 12.3 of the Plan violates 11 U.S.C. §524(e) in that it purports to eliminate the liability of third parties other than the Debtor to the holders of claims or interests. These third parties include the Debtor's present or former directors, officers, employees, advisors, attorneys, and agents. Such third party releases were explicitly rejected by the Fifth Circuit Court of Appeals. *See In re Pacific Lumber Co.*, 584 F.3d 229, 251-252 (5th Cir. 2009).

WHEREFORE, the Bandas Parties pray that the Court deny confirmation and grant such other and further relief as is just and proper.

DATED: May 10, 2010

Respectfully submitted,

HOOVER SLOVACEK LLP

By: /s/ Edward L. Rothberg
EDWARD L. ROTHBERG
State Bar No. 17313990
MELISSA A. HASELDEN
State Bar No. 00794778
ANNIE E. CATMULL
State Bar No. 00794932
5847 San Felipe, Suite 2200
Houston, Texas 77057
Telephone: (713) 977-8686
Facsimile: (713) 977-5395

ATTORNEYS FOR CHRIS BANDAS, THE BANDAS LAW
FIRM, JEFFREY D. MEYER, AND MOULTON & MEYER, LLP

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2010, a true and correct copy of the foregoing document was forwarded to all parties on the attached Service List via ECF and/or First Class Mail.

/s/ Edward L. Rothberg
EDWARD L. ROTHBERG

Label Matrix for local noticing 0541-4 Case 09-35037 Southern District of Texas Houston Fri Apr 23 11:59:45 CDT 2010	BANDAS LAW FIRM, P.C. 500 North Shoreline, Suite 1020 Corpus Christi, TX 78471	CAMBRIDGE MANAGEMENT GROUP, LLC 350 North Street Dallas, TX 75207-4430
Gyro-Trac (USA), Inc. c/o Jennifer Queen, General Counsel 10 Flying Cloud Drive Summerville, SC 29483-8113	Gyro-Trac, Inc. c/o Jennifer Queen, General Counsel 10 Flying Cloud Drive Summerville, SC 29483-8113	MOULTON & MEYER, LLP 800 Taft Street Houston, TX 77019-2612
Pendergraft & Simon LLP The Riviana Building 2777 Allen Parkway, Suite 800 Houston, Tx 77019-2129	Right of Way Maintenance Equipment Company 11443 Old Hwy 105 E. Conroe, Tx 77303-5463	4 United States Bankruptcy Court PO Box 61010 Houston, TX 77208-1010
AT&T P O Box 65057 Dallas, TX 75265	Alamo Iron Works P O Box 231 San Antonio, TX 78291-0231	Alltex Interior Supply, Inc P O Box 5533 Bryan, TX 77805-5533
American Coatings P O Box 1426 Tomball, TX 77377-1426	Ample Computer Service 1528 Avenue O Huntsville, TX 77340-4452	Bandas Law Firm 500 N. Shoreline #1020 Corpus Christi, TX 78471
Bandas Law Firm C/o Michael S. Hays 1233 West Loop South, Suite 1000 Houston, Texas 77027-9109	Bandas Law Firm, PC & Moulton & Meyer, LLP c/o Edward L. Rothberg Weycer, Kaplan, Pulaski & Zuber, PC 11 Greenway Plaza, Suite 1400 Houston, TX 77046-1130	Bickley, Prescott & Company 901 Normal Park #2060 Huntville, TX 77320-3770
Bio Fuel Consultants of North America 9250 Corkscrew Road, Suite 8 Estero, Fl 33928-3216	CME-Conveying & Mining Equip. 8300 Hempstead * Suite A Houston, Texas 77008-6175	CMG/Cambridge Management Group, LLC 266 Harristown Road * Suite #300 Glen Rock, NJ 07452-3321
CMG/Cambridge Management Group, LLC C/O Alexander Chae 1000 Louisiana, Suite 3400 Houston, TX 77002-5011	CNH Capital Dept. CH 10460 Palatine, ILL 60055-0460	CNH Capital P O Box 3038 Evansville, IN 47730-3038
Capital One P O Box 60599 City of Industry, CA 91716-0599	Christopher R. Johnston Firth, Johnston & Martineez 415 N. Mesa, Third Floor El Paso, Texas 79901	Conroe Mill Supply P O Box 447 Conroe, TX 77305-0447
Conroe Welding Supply 415 South Frazier Conroe, TX 77301-5098	Delta Dental/Allied Administrators P O Box 45793 San Fransisco, CA 94145-0793	Don Stocking 2040 N. Loop 336 West Conroe, TX 77304-3500

Eager Beaver (Dietrich)
21838 Magnolia Hills Drive
Magnolia, Texas 77354-7633

Exxon
P.O. Box 5727
Carol Stream, IL 601975727

Flexible Manufacturing
10430 - 180 Street
Edmonton, AB, Canada T55 1C3

Home Depot Credit Services
P. O. Box 6029
The Lakes, NV 88901-6029

Independent Hydraulic
P O Box 1127
Conroe, TX 77305-1127

Inlands Technology
401 East 27th Street
Tcoma, WA 98421-1203

J & S Equipment
1583 Memorial Lane
Conroe, TX 77304-1608

J&B Auto
11635 Highway 105E
Conroe, TX 77306-5371

Jim Hay / Uni-Fab
c/o Kevin R. Knight, Attorney of Law
PO Box 925
Madisonville, TX 77864-0925

Joan M. O'Hagan
P. O. Box 853
New Waverly, TX 77358-0853

John F. Bryan
8291 Lakeside Drive
Englewood, FL 34224-7687

John O'Hagan, Sr.
2271 Teas Crossing Drive
Conroe, TX 77304-7301

John P. O'Hagan, Sr.
2271 Teas Crossing Drive
Conroe, TX 77304-7301

Karen E. O'Hagan
15625 Tobacco Road
Montgomery, TX 77316-2443

King Kong Tools
753 Church Street
Buford, GA 30518-3358

Lester Buzbee, III
116 S. Avenue C
Humble, TX 77338-4503

Lowe & Associates
177 Meeting Street #400
Charleston, SC 29401-3189

M-Fab & Machine
17781 Hwy 105
Conroe, TX 77306-5913

Paychex, Inc.
11777 Katy Freeway #200
Houston, Texas 77079-1772

Peterson Pacific Corporation
29408 Airport Road
Eugene, Oregon 97402-9541

Pitney Bowes Global Finance Serv.
P. O. Box 856460
Louisville, KY 40285-6460

Premium Assignment Corp./
Catlin Specialty Ins. Group
P O Box 3066
Tallahassee, FL 32315-3066

Principal Insurance
P O Box 14513
Des Moines, IA 50306-3513

Randy Welch
14242 Carneswood
Tomball, TX 77375-4009

Risley Equipment
10820-89 Avenue
Grand Prairie, Alberta Canada T8* 6R7

Rolling Thunder - Kat Meyers
11402 E. J. Hawk
Houston, Texas 77044-5867

Scott A. O'Hagan, Sr.
P O Box 977
New Waverly, TX 77358-0977

Shell
P. O. Box 689010
Des Moines, IA 50368-9010

Soapman of Texas
1414 S. Frazier #103
Conroe, TX 77301-4475

Soft Trac Supply
12 Phillips Drive SE
Carterville, GA 30121-2476

Strouhal Tire
P O Box 671579
Dallas, TX 75267-1579

Strouhal Tire Co.
P O Box 7
Hungerford, Tx 77448-0007

SunSource Distribution
P O Box 200794
Dallas, TX 75320-0794

UPS
P O Box 7247-0244
Philadelphia, PA

UPS
P O Box 7247-0244
Philadelphia, PA 19170-0001

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

Unifirst
12700 SH 30 Suite #100
College Station, TX 77845

William S. O'Hagan Jr.
15625 Tobacco Road
Montgomery, Tx 77316-2443

Wright Express Financial Services
PO Box 639
Portland, ME 04104-0639

Christopher A Bandas
Bandas Law Firm, P.C.
500 N. Shoreline Boulevard
Suite 1020
Corpus Christi, TX 78471

JEFFREY D. MEYER
800 Taft Street
Houston, TX 77019-2612

Joe Bryan Bickley
901 Normal Park
Suite 206
Huntsville, TX 77320-3770

Leonard H Simon
Pendergraft & Simon L.L.P.
2777 Allen Parkway
Ste 800
Houston, TX 77019-2129

PATRICIA A. SHACKELFORD
802 N. Carancahua, Suite 2300
Corpus Christi, TX 78470

ROBERT C. CURFISS
19826 Sundance Drive
Humble, TX 77346-1402

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Pendergraft & Simon, LLP

(u)The Shackelford Law Firm

(d)William S. O'Hagan, Jr.
15625 Tobacco Road
Montgomery, TX 77316-2443

(u)Jim Hay

(u)Virgil Abke

End of Label Matrix
Mailable recipients 74
Bypassed recipients 5
Total 79

Label Matrix for local noticing
0541-4
Case 09-35037
Southern District of Texas
Houston
Fri Apr 23 11:59:45 CDT 2010

BANDAS LAW FIRM, P.C.
500 North Shoreline, Suite 1020
Corpus Christi, TX 78471

CAMBRIDGE MANAGEMENT GROUP, LLC
350 North Street
Dallas, TX 75207-4430

Gyro-Trac (USA), Inc.
c/o Jennifer Queen, General Counsel
10 Flying Cloud Drive
Summerville, SC 29483-8113

Gyro-Trac, Inc.
c/o Jennifer Queen, General Counsel
10 Flying Cloud Drive
Summerville, SC 29483-8113

MOULTON & MEYER, LLP
800 Taft Street
Houston, TX 77019-2612

Pendergraft & Simon LLP
The Riviana Building
2777 Allen Parkway, Suite 800
Houston, Tx 77019-2129

Right of Way Maintenance Equipment Company
11443 Old Hwy 105 E.
Conroe, Tx 77303-5463

4
United States Bankruptcy Court
PO Box 61010
Houston, TX 77208-1010

AT&T
P O Box 65057
Dallas, TX 75265

Alamo Iron Works
P O Box 231
San Antonio, TX 78291-0231

Alltex Interior Supply, Inc
P O Box 5533
Bryan, TX 77805-5533

American Coatings
P O Box 1426
Tomball, TX 77377-1426

Ample Computer Service
1528 Avenue O
Huntsville, TX 77340-4452

Bandas Law Firm
500 N. Shoreline #1020
Corpus Christi, TX 78471

Bandas Law Firm
C/o Michael S. Hays
1233 West Loop South, Suite 1000
Houston, Texas 77027-9109

Bandas Law Firm, PC & Moulton & Meyer, LLP
c/o Edward L. Rothberg
Weycer, Kaplan, Pulaski & Zuber, PC
11 Greenway Plaza, Suite 1400
Houston, TX 77046-1130

Bickley, Prescott & Company
901 Normal Park #2060
Huntville, TX 77320-3770

Bio Fuel Consultants of North America
9250 Corkscrew Road, Suite 8
Estero, Fl 33928-3216

CME-Conveying & Mining Equip.
8300 Hempstead * Suite A
Houston, Texas 77008-6175

CMG/Cambridge Management Group, LLC
266 Harristown Road * Suite #300
Glen Rock, NJ 07452-3321

CMG/Cambridge Management Group, LLC
C/O Alexander Chae
1000 Louisiana, Suite 3400
Houston, TX 77002-5011

CNH Capital
Dept. CH 10460
Palatine, ILL 60055-0460

CNH Capital
P O Box 3038
Evansville, IN 47730-3038

Capital One
P O Box 60599
City of Industry, CA 91716-0599

Christopher R. Johnston
Firth, Johnston & Martinez
415 N. Mesa, Third Floor
El Paso, Texas 79901

Conroe Mill Supply
P O Box 447
Conroe, TX 77305-0447

Conroe Welding Supply
415 South Frazier
Conroe, TX 77301-5098

Delta Dental/Allied Administrators
P O Box 45793
San Fransisco, CA 94145-0793

Don Stocking
2040 N. Loop 336 West
Conroe, TX 77304-3500

Eager Beaver (Dietrich)
21838 Magnolia Hills Drive
Magnolia, Texas 77354-7633

Exxon
P.O. Box 5727
Carol Stream, IL 601975727

Flexaire Manufacturing
10430 - 180 Street
Edmonton, AB, Canada T55 1C3

Home Depot Credit Services
P. O. Box 6029
The Lakes, NV 88901-6029

Independent Hydraulic
P O Box 1127
Conroe, TX 77305-1127

Inlands Technology
401 East 27th Street
Tcoma, WA 98421-1203

J & S Equipment
1583 Memorial Lane
Conroe, TX 77304-1608

J&B Auto
11635 Highway 105E
Conroe, TX 77306-5371

Jim Hay / Uni-Fab
c/o Kevin R. Knight, Attorney of Law
PO Box 925
Madisonville, TX 77864-0925

Joan M. O'Hagan
P. O. Box 853
New Waverly, TX 77358-0853

John F. Bryan
8291 Lakeside Drive
Englewood, FL 34224-7687

John O'Hagan, Sr.
2271 Teas Crossing Drive
Conroe, TX 77304-7301

John P. O'Hagan, Sr.
2271 Teas Crossing Drive
Conroe, TX 77304-7301

Karen E. O'Hagan
15625 Tobacco Road
Montgomery, TX 77316-2443

King Kong Tools
753 Church Street
Buford, GA 30518-3358

Lester Buzbee, III
116 S. Avenue C
Humble, TX 77338-4503

Lowe & Associates
177 Meeting Street #400
Charleston, SC 29401-3189

M-Fab & Machine
17781 Hwy 105
Conroe, TX 77306-5913

Paychex, Inc.
11777 Katy Freeway #200
Houston, Texas 77079-1772

Peterson Pacific Corporation
29408 Airport Road
Eugene, Oregon 97402-9541

Pitney Bowes Global Finance Serv.
P. O. Box 856460
Louisville, KY 40285-6460

Premium Assignment Corp./
Catlin Specialty Ins. Group
P O Box 3066
Tallahassee, FL 32315-3066

Principal Insurance
P O Box 14513
Des Moines, IA 50306-3513

Randy Welch
14242 Carneswood
Tomball, TX 77375-4009

Risley Equipment
10820-89 Avenue
Grand Prairie, Alberta Canada T8* 6R7

Rolling Thunder - Kat Meyers
11402 E. J. Hawk
Houston, Texas 77044-5867

Scott A. O'Hagan, Sr.
P O Box 977
New Waverly, TX 77358-0977

Shell
P. O. Box 689010
Des Moines, IA 50368-9010

Soapman of Texas
1414 S. Frazier #103
Conroe, TX 77301-4475

Soft Trac Supply
12 Phillips Drive SE
Carterville, GA 30121-2476

Strouhal Tire
P O Box 671579
Dallas, TX 75267-1579

Strouhal Tire Co.
P O Box 7
Hungerford, Tx 77448-0007

SunSource Distribution
P O Box 200794
Dallas, TX 75320-0794

UPS
P O Box 7247-0244
Philadelphia, PA

UPS
P O Box 7247-0244
Philadelphia, PA 19170-0001

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

Unifirst
12700 SH 30 Suite #100
College Station, TX 77845

William S. O'Hagan Jr.
15625 Tobacco Road
Montgomery, Tx 77316-2443

Wright Express Financial Services
PO Box 639
Portland, ME 04104-0639

Christopher A Bandas
Bandas Law Firm, P.C.
500 N. Shoreline Boulevard
Suite 1020
Corpus Christi, TX 78471

JEFFREY D. MEYER
800 Taft Street
Houston, TX 77019-2612

Joe Bryan Bickley
901 Normal Park
Suite 206
Huntsville, TX 77320-3770

Leonard H Simon
Pendergraft & Simon L.L.P.
2777 Allen Parkway
Ste 800
Houston, TX 77019-2129

PATRICIA A. SHACKELFORD
802 N. Carancahua, Suite 2300
Corpus Christi, TX 78470

ROBERT C. CURFISS
19826 Sundance Drive
Humble, TX 77346-1402

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Pendergraft & Simon, LLP

(u)The Shackelford Law Firm

(d)William S. O'Hagan, Jr.
15625 Tobacco Road
Montgomery, TX 77316-2443

(u)Jim Hay

(u)Virgil Abke

End of Label Matrix
Mailable recipients 74
Bypassed recipients 5
Total 79